

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<div>In re:</div> <div>Boy Scouts of America and Delaware BSA, LLC,</div> <div>Debtors.¹</div>	<div>Chapter 11</div> <div>Case No. 20-10343 (LSS)</div> <div>(Jointly Administered)</div>
<div>National Union Fire Insurance Co. of Pittsburgh, PA, et al.,</div> <div>Appellants.</div>	<div>Case No. 22-cv-01237-RGA</div> <div>(Jointly Consolidated)²</div>
<div>v.</div> <div>Boy Scouts of America and Delaware BSA, LLC,</div> <div>Appellees.</div>	

**APPELLANTS LUJAN CLAIMANTS' STATEMENT OF ISSUES ON
APPEAL AND DESIGNATION OF ITEMS TO BE INCLUDED IN
THE RECORD OF APPEAL**

¹ The Debtors in the Chapter 11 Cases, together with the last four digits of Debtors' federal tax identification numbers, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

² Case numbers 22-cv-01237, 22-cv-01238, 22-cv-01239, 22-cv-01240, 22-cv-01241, 22-cv-01242, 22-cv-01243, 22-cv-01244, 22-cv-01245, 22-cv-01246, 22-cv-01247, 22-cv-01249, 22-cv-01250, 22-cv-01251, 22-cv-01252, 22-cv-01258, and 22-cv-01263 have been jointly consolidated under 22-cv-01237. Lujan Claimants' appeal is docketed at 22-cv-01258.

Pursuant to Federal Rule of Appellate Procedure 6(b)(2)(B), Appellants Tort Claimants represented by Lujan & Wolff LLP (“Lujan Claimants”) submit the following: (i) statement of issues to be considered on appeal from the District Court’s judgment set forth in the Order [D.I. 151] and accompanying Opinion [D.I. 150] affirming the Bankruptcy Court’s Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC [Bankr. D.I. 10316] (“Confirmation Order”) and accompanying Opinion [Bankr. D.I. 10136], and all other subsumed judgments, orders, and decrees brought up for review in the appeal; and (ii) designation of items to be included in the record on appeal.

I. Statement of Issues to Be Presented on Appeal

Appellants present the following statement of issues to be considered on appeal.

1. Do the Bankruptcy Court and District Court lack subject matter jurisdiction over abuse survivors’ claims against nondebtors, including local councils, chartered organizations, insurers, Roman Catholic Entities, and other entities?

2. Does the Bankruptcy Code or other applicable statutory or case law authorize the nonconsensual third party releases and injunctions in the Plan, and the Bankruptcy Court’s Opinion and Confirmation Order?

3. Do the Plan, Opinion, and Confirmation Order, impermissibly restrict and violate Lujan Claimants' direct action rights against insurers and interests in insurance policies, including in contravention of the McCarran-Ferguson Act?

4. Do the Plan, Opinion, and Confirmation Order wrongly dispose of and control the Archbishop of Agana's interests in insurance policies, including in violation of the automatic stay issued in In re Archbishop of Agana, Case No. 19-00010 (Bankr. D. Guam), and wrongly interfere with the District Court of Guam's jurisdiction to determine whether to permit Lujan Claimants to recover against the Archbishop of Agana?

5. Do the Bankruptcy Court and District Court lack jurisdiction or authority to approve the sale and settlement of 1976 and 1977 Hartford policies, as Boy Scouts of America previously released its rights to coverage for sexual abuse claims as to these policies?

6. Did the Bankruptcy Court and District Court erroneously approve the insurance settlement agreements, including the release and injunction of claims against insurance proceeds?

7. Does the Plan fail to properly classify the claims of Lujan Claimants and treat Lujan Claimants unequally and unfairly?

8. Does the Plan treat Abuse Survivors unequally and unfairly as some Survivors lose their third party claims against chartered organizations while other

Survivors retain their third party claims against chartered organizations?

9. Does the Plan fail the best interests of creditors test?

10. Did the Bankruptcy Court erroneously grant Debtors' motion to amend/supplement the findings of fact and conclusions of law and enter the Confirmation Order?

II. Designations of Items to Be Included in the Record on Appeal

Lujan Claimants submit the following designation of items to be included in the record on appeal, which includes all exhibits, appendices, attachments, and/or addenda:

A. Bankruptcy Court Docket Entries

Item	Date Filed/Entered	Bankr. Dkt. No.	Description
1.	2/18/2020	1	Voluntary Petition
2.	2/18/2020	20	Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
3.	2/18/2020	21	Disclosure Statement for the Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
4.	4/8/2020	377	Schedules of Assets and Liabilities for Delaware BSA, LLC (Case No. 20-10342)
5.	3/1/2021	2293	Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
6.	3/1/2021	2294	Disclosure Statement for the Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
7.	3/1/2021	2295	Motion to Approve Debtors' Motion for Entry of an Order Approving the Disclosure Statement and the Form

			and Manner of Notice
8.	3/16/2021	2391	Motion of the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings
9.	3/17/2021	2399	Motion of the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 28 U.S.C. § 157(d) and Bankruptcy Rule 5011(a), Withdrawing the Reference of Proceedings Involving the Estimating of Personal Injury Claims
10.	3/18/2021	2407	Transcript regarding Hearing Held 3/17/2021 RE: Omnibus
11.	4/13/2021	2592	Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
12.	4/14/2021	2594	Amended Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
13.	4/14/2021	2595	Notice of Filing of Redlines of Plan and Disclosure Statement
14.	4/15/2021	2612	Debtors' Objection to the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice's Motion for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings
15.	4/16/2021	2624	Second Mediators' Report
16.	5/6/2021	3231	Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee
17.	5/6/2021	3247	Objection to Disclosure Statement Filed by Paul Mones,

			P.C.
18.	5/6/2021	3263	Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
19.	5/10/2021	3526	Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Form of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
20.	5/10/2021	3581	U.S. Trustee's Objection to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Form of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
21.	5/12/2021	3856	Century Indemnity Company's Objections to the Debtors' Disclosure Statement
22.	5/14/2021	3949	Notice of Filing of Exhibit A to Objection to the Adequacy of Debtors' Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization and Joinder of the Objection of the Tort Claimants' Committee
23.	5/14/2021	4089	Omnibus Reply of the Official Committee of Tort Claimants, the Coalition of Abused Scouts for Justice, and the Future Claimants' Representative to Objections

			to Motion of the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings
24.	5/14/2021	4092	Joinder of the Roman Catholic Archbishop of Los Angeles, a Corporation Sole, and Its Related BSA-Chartered Organizations to the Disclosure Statement Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole [D.I. 3263]
25.	5/16/2021	4105	Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
26.	5/16/2021	4107	Proposed Amendments to Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America
27.	5/21/2021	4716	Transcript regarding Hearing Held 5/19/2021 Re: Disclosure Statement
28.	5/17/2021	4321	Joinder of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Objection Tort Claimants' Committee
29.	6/18/2021	5368	Third Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
30.	6/18/2021	5371	Amended Chapter 11 Combined Plan & Disclosure Statement / Proposed Amendments to Disclosure Statement for the Third Amended Chapter 1 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
31.	6/18/2021	5372	Notice of Filing of Redlines of Third Amended Plan and Proposed Amendments to Disclosure Statement

32.	7/1/2021	5466	Debtors' Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Order, (I) Authorizing the Debtors to Enter into and Perform under the Restructuring Support Agreement, and (II) Granting Related Relief
33.	7/2/2021	5484	Fourth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
34.	7/2/2021	5485	Amended Disclosure Statement for the Fourth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
35.	7/2/2021	5486	Notice of Filing of Redlines of Fourth Amended Plan and Amended Disclosure Statement
36.	7/8/2021	5529	Transcript regarding Hearing Held 7/7/2021 Re: Status Conference
37.	7/22/2021	5674	Limited Objection and Reservation of Rights of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors' Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter into and Perform under the Restructuring Support Agreement, and (II) Granting Related Relief
38.	7/22/2021	5676	Joint Objection of the Roman Catholic Ad Hoc Committee and the United Methodist Ad Hoc Committee to the Debtors' Motion for Authorization to Enter into and Perform under Restructuring Support Agreement and for Related Relief and Joinder in Limited Objection and Reservation of Rights of the Church of Jesus Christ of Latter-Day Saints
39.	7/22/2021	5684	Certain Insurers Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform under the Restructuring Support Agreement
40.	7/22/2021	5707	[SEALED] Objection to the Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement
41.	7/22/2021	5708	[SEALED] Declaration of Daniel Shamah in Support of Century's Objections to Debtors' Motion for Entry of Order Authorizing Debtors to Enter into and Perform

			under the Restructuring Support Agreement
42.	7/23/2021	5723	Final Redacted Version of Insurers' Objection to the Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform under the Restructuring Support Agreement
43.	7/26/2021	5759	Debtors' Omnibus Reply in Further Support of Debtors' Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter into and Perform under the Restructuring Support Agreement, and (II) Granting Related Relief
44.	7/26/2021	5760	Supplemental Brief of Coalition of Abused Scouts for Justice, Official Committee of Tort Claimants, and Future Claims Representative In Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Enter Into and Perform under the Restructuring Support Agreement
45.	8/9/2021	5925	Hartford's Supplement to Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter into Case 1:22-cv-01237-RGA Document 211 Filed 04/24/23 Page 6 of 31 PageID #: 17883 7 and Perform Under the Restructuring Support Agreement
46.	8/9/2021	5932	Redacted Version of Supplemental Objection of Century Indemnity to Motion to Authorize Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter into and Perform under the Restructuring Support Agreement
47.	8/9/2021	5934	Certain Excess Insurers' Joinder in Century's Supplemental Objection
48.	8/9/2021	5935	AIG's Joinder to Century's Supplemental Objection and Partial Joinder to Hartford's Supplemental Objection
49.	8/11/2021	5964	PCVA Claimants' Supplemental Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Objection to the Debtors' Revised Proposed Solicitation Procedures Order
50.	8/16/2021	6009	Supplemental Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole, to Debtors'

			Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
51.	8/16/2021	6039	Lujan Claimants' Supplemental Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization; Joiner in PCVA Claimants' Supplemental Objection to the Adequacy of Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization and Objection to the Debtors' Revised Proposed Solicitation Procedures Order
52.	8/16/2021	6044	Joinder of (I) the Roman Catholic Archbishop of Los Angeles, a Corporation Sole, and Its Related BSA-Chartered Organizations and (II) the Roman Catholic Diocese of Brooklyn, New York to the Supplemental Disclosure Statement Objection of the Church of Jesus Christ of Latter-Day Saints, a Utah Corporation Sole [D.I. 6009]
53.	8/17/2021	6052	Certain Insurers' Supplemental Objection to Motion for Approval of Debtors' Disclosure Statement
54.	8/17/2021	6056	Certain Excess Insurers' Supplemental Objection to Debtors' Disclosure Statement
55.	8/17/2021	6062	Certain Insurers' Superseding Objections to the Disclosure Statement for Debtors' Fourth Amended Plan
56.	8/18/2021	6083	Century's Objections to the Debtors' Disclosure Statement
57.	8/20/2021	6098	Transcript regarding Hearing Held 8/19/2021 Re: Ruling on RSA Motion
58.	9/14/2021	6210	Sixth Mediators' Report
59.	9/15/2021	6212	Fifth Amended Chapter 11 Plan of Reorganization for

			Boy Scouts of America and Delaware BSA, LLC
60.	9/15/2021	6213	Amended Disclosure Statement for the Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
61.	9/15/2021	6222	Tort Claimants' Committee's Motion to Adjourn the Hearing to Consider Approval of Disclosure Statement and Solicitation Procedures for the Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
62.	9/16/2021	6246	Joint Reply of the Future Claimants' Representative and the Coalition of Abused Scouts for Justice in Support of Debtors' Disclosure Statement for the Fifth Amended Plan, Solicitation Procedures and Form of Ballots
63.	9/16/2021	6249	Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order Approving Disclosure Statement
64.	9/20/2021	6314	Joinder of Lujan Claimants to Tort Claimants' Committee's Motion to Adjourn the Hearing to Consider Approval of Disclosure Statement and Solicitation Procedures for the Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC (D.I. 6222)
65.	9/27/2021	6377	Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
66.	9/27/2021	6383	Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
67.	9/28/2021	6389	Transcript regarding Hearing Held 9/21/2012 RE: Disclosure Statement
68.	9/28/2021	6390	Transcript regarding Hearing Held 9/22/2021 RE: Disclosure Statement (continued)
69.	9/28/2021	6391	Transcript regarding Hearing Held 9/23/2021 RE: Disclosure Statement (continued)
70.	9/28/2021	6392	Transcript regarding Hearing Held 9/23/2021 RE: Omnibus
71.	9/29/2021	6416	Modified Fifth Amended Chapter 11 Plan of

			Reorganization for Boy Scouts of America and Delaware BSA, LLC
72.	9/29/2021	6419	Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
73.	9/29/2021	6429	Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
74.	9/29/2021	6430	Redline of Modified Fifth Amended Chapter 11 Plan of Reorganization
75.	9/29/2021	6431	Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
76.	9/30/2021	6432	Redline of the Amended Disclosure Statement
77.	9/30/2021	6436	Transcript regarding Hearing Held 9/28/2021 RE: Disclosure Statement (continued)
78.	9/30/2021	6437	Transcript regarding Hearing Held 9/29/2021 RE: Disclosure Statement (continued)
79.	9/30/2021	6438	Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
80.	9/30/2021	6443	Solicitation Version Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
81.	9/30/2021	6445	Solicitation Version Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
82.	10/8/2021	6532	Notice of Intent of Lujan Claimants to Participate in Plan Confirmation Proceedings
83.	11/30/2021	7515	Notice of Filing of Plan Supplement to Modified Fifth

			Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
84.	12/13/2021	7741	Seventh Mediator's Report
85.	12/14/2021	7744	Notice of Withdrawal of Seventh Mediator's Report
86.	12/14/2021	7745	Seventh Mediator's Report
87.	12/14/2021	7772	Notice of Seventh Mediator's Report Regarding Century and Chubb Companies Term Sheet Including Treatment of Chartered Organizations
88.	12/18/2021	7832	Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
89.	12/18/2021	7833	Second Modified Fifth Amended Chapter 11 Plan, and Blackline
90.	12/18/2021	7834	Second Modified Fifth Amended Chapter 11 Plan, and Blackline
91.	12/21/2021	7884	Eighth Mediator's Report
92.	12/22/2021	7915	(Sealed) Verified Statement of Lujan & Wolff LLP Pursuant to Bankruptcy Rule 2019
93.	12/22/2021	7924	Notice of Filing of Final Redacted Version of Verified Statement of Lujan & Wolff LLP Pursuant to Bankruptcy Rule 2019
94.	12/22/2021	7928	Ninth Mediator's Report
95.	12/18/2021	7832	Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
96.	12/23/2021	7953	Notice of Filing of Amended Plan Supplement to Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
97.	1/3/2022	8095	Tenth Mediator's Report
98.	1/4/2022	8141	Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Preliminary Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of

			Reorganization for Boy Scouts of America and Delaware BSA, LLC
99.	1/7/2022	8190	The Official Committee of Tort Claimants' Status Report Re: Second Modified Fifth Amended Chapter 11 Plan of Reorganization
100.	1/11/2022	8234	Debtors' Response to the Official Committee of Tort Claimants' Status Report
101.	1/18/2022	8345	Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Final Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
102.	1/18/2022	8346	Notice of Filing of Solicitation Changes in Connection with Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Final Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
103.	1/29/2022	8567	Notice of Filing of Second Amended Plan Supplement to Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
104.	1/31/2022	8607	Lujan Claimants' Identification of Witnesses
105.	2/3/2022	8647	Notice of Filing of Third Amended Plan Supplement to Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
106.	2/4/2022	8683	Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
107.	2/4/2022	8687	Joinder of Archbishop of Agana, a Corporation Sole, to the Roman Catholic Ad Hoc Committee's Objection to the Debtors' Second Modified Fifth Amended Chapter 11 Plan of Reorganization

108.	2/4/2022	8694	Delaware BSA, LLC's Monthly Operating Report
109.	2/4/2022	8695	[SEALED] Certain Insurers' Objection to Confirmation of Debtors' Chapter 11 Plan
110.	2/4/2022	8697	[SEALED] Appendix to Certain Insurers Objection
111.	2/7/2022	8708	Lujan Claimants' Objection to Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, and Joinder in Objection Filed by Guam Committee
112.	2/7/2022	8710	United States Trustee's Objection to Confirmation of the Second Modified Fifth Amended Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
113.	2/10/2022	8772	Eleventh Mediator's Report
114.	2/11/2022	8793	Notice of Filing of Proposed Redacted Version of Certain Insurers' Objection to Confirmation of Debtors' Chapter 11 Plan and Appendix to Certain Insurers' Objection to Confirmation of Debtors' Chapter 11 Plan
115.	2/14/2022	8811	Unsealed Joint FCR and Coalition Motion for Entry of an Order Striking Portions of Bates Reports and Precluding Testimony Related to Improper Valuation Opinion
116.	2/15/2022	8812	Unsealed Version of the Limited Objection of the Tort Claimants' Committee to Findings Related to the Valuation of Abuse Claims
117.	2/15/2022	8813	Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
118.	2/15/2022	8814	Third Modified Fifth Amended Chapter 11 Plan of Reorganization, and Blackline
119.	2/15/2022	8815	Notice of Filing of Fourth Amended Plan Supplement to Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
120.	2/15/2022	8816	Notice of Filing of Exhibits I-1 and J-1 to Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization and Redlines Thereof

121.	2/15/2022	8817	Notice of Filing of Exhibits I-2, I-3, I-4 and J-2 to Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
122.	2/15/2022	8819	Transcript regarding Hearing Held 2/11/2022 Re: Status Conference
123.	2/15/2022	8825	Supplement to Appendix to Certain Insurers' Objection to Confirmation
124.	2/15/2022	8830	Order (I) Amending and Scheduling Certain Supplemental Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims
125.	2/16/2022	8858	Amended Proposed Redacted Versions of Certain Insurers Objection to Confirmation of Debtors Chapter 11 Plan and Appendix
126.	2/18/2022	8894	Order Approving Form and Manner of Notice of Supplemental Disclosure Regarding Plan Modifications
127.	2/18/2022	8904	Supplemental Disclosure Regarding Plan Modifications and Summary of Chartered Organization Options under the Debtors' Modified Chapter 11 Plan of Reorganization, Opt-Out Election Procedures for Participating Chartered Organizations, and Supplemental Voting Deadline of March 7, 2022 at 4:00 p. m. (Eastern Time) for Holders of Class 9 Indirect Abuse Claims
128.	2/18/2022	8905	Notice of Supplemental Voting Deadline of March 7, 2022 at 4:00 p.m. (Eastern Time) for Holders of Class 8 Direct Abuse Claims and Limited Disclosure Regarding Changes in Debtors' Chapter 11 Plan of Reorganization Filed by Boy Scouts of America
129.	2/18/2022	8907	Notice of Filing of Exhibits I-2, I-3, I-4 and J-2 to Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
130.	2/18/2022	8908	Notice of Filing of Exhibit J-1 to Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization

131.	2/18/2022	8910	Notice of Errata Retarding Certain Provisions in Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
132.	2/25/2002	9009	Transcript regarding Hearing Held 2/24/2022 RE: Status Conference
133.	2/25/2022	9023	Supplemental Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
134.	2/25/2022	9031	Lujan Claimants' Supplemental Objection to Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, and Joinder in Objections of United States Trustee and Guam Committee
135.	2/25/2022	9032	Notice of Summary Final Voting Report Data with Respect to Local Councils and Chartered Organizations Named in Abuse Survivor Proofs of Claim
136.	3/2/2022	9096	Hartford's Brief in Support of Confirmation of the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
137.	3/2/2022	9097	Notice of Filing of Fifth Amended Plan Supplement to Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
138.	3/3/2022	9114	Debtors' (I) Memorandum of Law in Support of Confirmation of Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC and (II) Omnibus Reply to Plan Confirmation Objections
139.	3/3/2022	9118	Debtors' Response to the Joint FCR and Coalition (I) Motion for Entry of an Order (A)(1) Striking Portions of Bates Rebuttal Report and the Entire Bates Supplemental Report and (2) Precluding Testimony Related to Improper Valuation Opinion or (B) in the Alternative, Granting Movants Leave to Submit a Rebuttal Report; and (II) Limited Objection to

			Confirmation of the Plan
140.	3/3/2022	9136	Transcript regarding Hearing Held 3/2/2022 RE: Motions in Limine
141.	3/3/2022	9146	Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
142.	3/4/2022	9150	Revised Order (I) Amended and Scheduling Certain Supplemental Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims
143.	3/7/2022	9172	Transcript regarding Hearing Held 3/4/2022 RE: Omnibus
144.	3/7/2022	9190	Notice of Filing of Unsealed Version of Statement of the Coalition of Abused Scouts for Justice and Future Claimants' Representative in Support of Confirmation of Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
145.	3/7/2022	9191	Lujan Claimants' Exhibit List
146.	3/7/2022	9192	Lujan Claimants' Witness List
147.	3/9/2022	9252	Transcript regarding Hearing Held 3/8/2022 RE: Pretrial Conference
148.	3/10/2022	9273	Declaration of Bruce Griggs
149.	3/10/2022	9274	Declaration of Michael Burnett
150.	3/10/2022	9275	Supplemental Declaration of Catherine Nownes-Whitaker
151.	3/11/2022	9279	Declaration of Devang Desai
152.	3/11/2022	9280	Declaration of Brian Whittman
153.	3/11/2022	9285	Final Pretrial Order for the Plan Confirmation Hearing
154.	3/12/2022	9309	Declaration of Adrian Azer

155.	3/13/2022	9312	Limited Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Declaration of Brian Whittman in Support of Confirmation of the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
156.	3/13/2022	9313	Lujan Claimants' Joinder in Objections of Roman Catholic Ad Hoc Committee and Guam Committee to Declaration of Brian Whittman
157.	3/14/2022	9316	Declaration of William S. Sugden
158.	3/14/2022	9317	Declaration of Makeda Murray
159.	3/15/2022	9339	Debtors' Response to the Certain Insurers' Evidentiary Objection to Declaration of Bruce Griggs
160.	3/15/2022	9341	Transcript regarding Hearing Held 3/14/2022 RE: Confirmation (Day 1)
161.	3/16/2022	9354	Transcript regarding Hearing Held 3/15/2022 RE: Confirmation (Day 2)
162.	3/17/2022	9386	Twelfth Mediator's Report
163.	3/17/2022	9388	Declaration of Charles E Bates
164.	3/18/2022	9389	Transcript regarding Hearing Held 3/16/2022 RE: Confirmation (Day 3)
165.	3/19/2022	9395	Declaration of James L. Patton, Jr.
166.	3/19/2022	9396	Declaration of Aaron Lundberg
167.	3/19/2022	9397	Declaration of Catherine Nownes-Whitaker
168.	3/19/2022	9398	Declaration of Nancy Gutzler
169.	3/19/2022	9400	Declaration of Jessica Horewitz
170.	3/19/2022	9401	Declaration of Paul Rytting
171.	3/21/2022	9406	Transcript regarding Hearing Held 3/17/2022 RE: Confirmation (Day 4)
172.	3/21/2022	9407	Transcript regarding Hearing Held 3/18/2022 RE: Confirmation (Day 5)

173.	3/21/2022	9408	Transcript regarding Hearing Held 3/17/2022 RE: Confirmation
174.	3/21/2022	9409	Transcript regarding Hearing Held 3/18/2022 RE: Confirmation
175.	3/22/2022	9411	Agreed Order Regarding Certain Insurers' Motions in Limine
176.	3/23/2022	9446	Declaration of Andrew Hammond
177.	3/23/2022	9449	Declaration of Paul Rytting
178.	3/23/2022	9454	Transcript regarding Hearing Held 3/21/2022 RE: Confirmation (Day 6)
179.	3/23/2022	9455	Transcript regarding Hearing Held 3/22/2022 RE: Confirmation (Day 7)
180.	3/24/2022	9478	Response of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Debtors' Supplemental Response to Objection of the Roman Catholic Ad Hoc Committee to the Declaration of Brian Whittman
181.	3/24/2022	9481	Declaration of Jason P. Amala
182.	3/25/2022	9482	Transcript regarding Hearing Held 3/23/2022 RE: Confirmation (Day 8)
183.	3/25/2022	9490	Transcript regarding Hearing Held 3/24/2022 RE: Confirmation (Day 9)
184.	3/25/2022	9491	Declaration of Tancred Schiavoni
185.	3/28/2022	9497	Transcript regarding Hearing Held 3/25/2022 RE: Trial
186.	3/29/2022	9508	Stipulation Between Debtors, Century, Hartford, Zurich, and Clarendon
187.	3/29/2022	9509	Stipulation Between Debtors, Settling Insurers, and Certain Insurers Regarding Admissibility of Insurance Policies
188.	3/30/2022	9517	Transcript regarding Hearing Held 3/28/2022 RE: Confirmation (Day 11)
189.	3/30/2022	9529	Stipulation Between Debtors and Certain Insurers Regarding Admission of Insurance Policies

190.	3/31/2022	9530	Transcript regarding Hearing Held 3/29/2022 RE: Confirmation (Day 12)
191.	4/1/2022	9544	Transcript regarding Hearing Held 3/30/2022 RE: Confirmation (Day 13)
192.	4/1/2022	9555	Notice of Continuing Objection of Archbishop of Agana, a Corporation Sole to the Debtors' Second Modified Fifth Amended Chapter 11 Plan of Reorganization
193.	4/3/2022	9559	Century's Counter-Designation and Rebuttal Designations of Jesse Lopez Deposition Transcript
194.	4/4/2022	9560	Notice of Filing of Revised Exhibit B (Settlement Trust Agreement) to the Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization and Redline Thereof
195.	4/4/2022	9562	Transcript regarding Hearing Held 3/30/2022 RE: Confirmation (Day 13)
196.	4/4/2022	9563	Transcript regarding Hearing Held 3/31/2022 RE: Confirmation (Day 14)
197.	4/4/2022	9564	Transcript regarding Hearing Held 4/1/2022 RE: Confirmation (Day 15)
198.	4/4/2022	9576	Stipulation Between Debtors and Certain Insurers Regarding Admissibility of Exhibits
199.	4/5/2022	9578	Transcript regarding Hearing Held 4/4/2022 RE: Confirmation (Day 16)
200.	4/5/2022	9591	Certification of Counsel Regarding the Stipulation Between the Debtors and Lujan Claimants Regarding Admissibility of Exhibits
201.	4/5/2022	9594	Notice of Filing of Sixth Amended Plan Supplement to Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
202.	4/8/2022	9616	Transcript regarding Hearing Held 4/6/2022 RE: Confirmation (Day 17)
203.	4/13/2022	9638	Transcript regarding Hearing Held 4/7/2022 RE: Confirmation (Day 18)

204.	4/13/2022	9639	Transcript regarding Hearing Held 4/11/2022 RE: Confirmation (Day 19)
205.	4/14/2022	9646	Transcript regarding Hearing Held 4/12/2022 RE: Confirmation (Day 20)
206.	4/14/2022	9648	Transcript regarding Hearing Held 4/13/2022 RE: Confirmation (Day 21)
207.	4/15/2022	9655	Letter to the Honorable Chief Judge Laurie Selber Silverstein from Jessica C. Lauria and Derek C. Abbott regarding certain decisions in W.R. Grace
208.	4/18/2022	9656	Transcript regarding Hearing Held 4/14/2022 RE: Confirmation (Day 22)
209.	4/20/2022	9673	Order Regarding Stipulation
210.	4/20/2022	9674	Order Regarding Stipulation
211.	4/20/2022	9675	Order Regarding Stipulation
212.	4/20/2022	9676	Order Regarding Stipulation
213.	4/20/2022	9677	Order Regarding Stipulation Between the Debtors and Lujan Claimants Regarding Admissibility of Exhibits
214.	4/21/2022	9693	Letter from Delia Lujan Wolff and Christopher Loizides in Response to D.I. 9655
215.	4/21/2022	9694	Notice of Errata Regarding Certain Provisions in Exhibit I-1 to the Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
216.	4/21/2022	9695	Notice of Filing of Addendum to Exhibit J-1 to the Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
217.	4/22/2022	9696	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
218.	4/22/2022	9697	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications), and Blackline
219.	4/22/2022	9698	Notice of Filing of Seventh Amended Plan Supplement to Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy

			Scouts of America and Delaware BSA, LLC
220.	4/22/2022	9699	Revised Proposed Findings of Fact, Conclusions of Law, and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications), and Blackline
221.	4/22/2022	9710	Dumas & Vaughn Claimants' Response to Letter Brief filed by Debtors on April 15, 2022 relating to W.R. Grace decisions
222.	4/27/2022	9746	Certain Insurers' Letter Response
223.	7/29/2022	10136	Opinion
224.	8/11/2022	10177	Corrected Thirteenth Mediator's Report
225.	8/12/2022	10188	Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion Pursuant to Fed. R. Bankr. P. 7052 and Fed. R. Civ. P. 52
226.	8/12/2022	10190	Notice of Filing of Blackline of Conformed (I) Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC and (II) Certain Other Plan Documents
227.	8/15/2022	10192	Certain Insurers' Objection to Debtors' Motion to Shorten Notice
228.	8/15/2022	10195	Notice of the Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion
229.	8/19/2022	10215	Transcript Regarding Hearing Held 8/18/2022 RE: Status Conference
230.	8/24/2022	10246	Lujan Claimants' Objection to Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion Pursuant to Fed. R. Bankr. P. 7052 and Fed. R. Civ. P. 52
231.	8/24/2022	10247	Certain Insurers' Objection to Motion to Amend and Supplement The Findings of Fact and Conclusions of Law

232.	8/29/2022	10258	Debtors' Omnibus Reply in Support of Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion Pursuant to Fed. R. Bankr. P. 7052 and Fed. R. Civ. P. 52
233.	8/29/2022	10259	Joint Reply of Tort Claimants' Committee, Coalition of Abused Scouts for Justice, Pfau Cochran Vertetis Amala PLLC and Zalkin Law Firm, PC. And the Future Claimants Representative to Certain Insurers' Objection
234.	8/29/2022	10262	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
235.	8/29/2022	10265	Notice of Filing of Revised Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
236.	8/30/2022	10271	Notice of Filing of Corrected Scheduled to the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
237.	9/2/2022	10288	Transcript Regarding Hearing Held 9/1/2022 RE: Motion to Amend/Supplement Findings of Fact/Conclusions of Law in Confirmation Opinion
238.	9/6/2022	10295	Notice of Filing of Further Revised Supplemental Findings of Fact and Conclusions of Law and Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
239.	9/6/2022	10296	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
240.	9/6/2022	10297	Notice of Filing of Blackline of Conformed Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC

241.	9/7/2022	10304	Letter from The Hon. Judge Silverstein re: Language for Paragraph 51(b)
242.	9/8/2022	10316	Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
243.	9/8/2022	10317	Transcript regarding Hearing Held 9/7/2022 RE: Status Conference re: Confirmation Order
244.	9/12/2022	10327	Order Releasing Pre-Petition Century/Chubb Claims Pursuant to Century and Chubb Companies Insurance Settlement Agreement
245.	9/16/2022	10358	Notice of Entry of Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
246.	9/22/2022	10434	Notice of Appeal filed by Archbishop of Agana, a Corporation Sole
247.	9/22/2022	10454	Notice of Appeal filed by Lujan Claimants

B. District Court Docket Entries

All docket entries in Tort Claimants v. Boy Scouts of America, et al., District Court Case No. 22-cv-01258-RGA (D. Del.), and National Union Fire Insurance Company of Pennsylvania, Pa., et al. v. Boy Scouts of America, et al., District Court Case No. 22-cv-01237-RGA (D. Del.), which includes all exhibits, appendices, attachments, addenda, hard drives, discs, and/or other submissions.

C. Exhibits

The parties agreed by stipulation that all exhibits admitted into the evidence at the Confirmation Hearing in the Bankruptcy Court shall be designated and that

the parties shall cooperate to facilitate transmittal of the record. In accordance with the instructions of the District Court, exhibits that were not docketed in the Bankruptcy Court were submitted to the District Court via multimedia filing and can be provided to the circuit clerk upon request. For avoidance of doubt, Lujan Claimants again designate all exhibits admitted into the evidence into the record for appeal. Lujan Claimants reserve the right to seek to amend or supplement the exhibits admitted into the record to the extent necessary to add any omitted exhibits.

Dated: April 24, 2023.

Respectfully submitted,

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